

IN THE UNITED STATES DISTRICT COURT

~~FOR THE UNITED STATES DISTRICT COURT OF THE DISTRICT OF MASSACHUSETTS~~

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SOUTHERN DISTRICT
JAN 11 2007

03327-049
(Inmate Number)

Walter Norton
(Name of Plaintiff)

USP Canaan
PO Box 300
(Address of Plaintiff)

Waymart, PA 18472

2006 DEC 21 AM 11:32
1:06-fp-477
(Case Number)

COMPLAINT

vs.

Cross Border Initiative Task

Force(CBI), MSP Essex County

Drug Task Force, Nashua Police
(Names of Defendants)

TO BE FILED UNDER: X 42 U.S.C. § 1983 - STATE OFFICIALS

X 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. Previous Lawsuits

A. If you have filed any other lawsuits in federal court while a prisoner please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

NONE

II. Exhaustion of Administrative Remedies

A. Is there a grievance procedure available at your institution?

X Yes No

B. Have you filed a grievance concerning the facts relating to this complaint?

 Yes X No

If your answer is no, explain why not This is about officers conduct
in connection with my arrest.

C. Is the grievance process completed? Yes X No

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use Item B for the names, positions and places of employment of any additional defendants.)

- A. Defendant Special Agent Michael O'Shaughnessy is employed
as Special Agent at Cross Border Initiative task force
- B. Additional defendants Robert Kew, Glen Coletti, Calice Couchman,
Kevin Frye, James Flaherty, Frank Waterman, Marcos Chavez, Brian
Proulx, Jason Steiner, Terry Hanson, William Canty, Stephen
Gondella, Mark Blanchard, Mark Rivet, Sean Richards, William
Moore.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

1. On January 23, 2004 I was arrested by a joint Federal and State
drug task force. During my arrest, as I was lying on the ground,
I was physically assaulted by several members of the joint task
force. The assault included punches and kicks to my face as well
as stomping my head into the concrete and several blows to my
body. The police used excessive force and brutality and I was
never charged with resisting arrest. Therefore I was in compl-
iance with the orders of the police and did not pose any threat
or danger to the officers.

3.

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Monetary damages for the sum of 1.5 million U.S.
dollars for the continued pain and suffering that the physical
abuse has caused as well as the mental anguish and punitive
damages. This abuse has caused me limited movement in my left
hand due to the fact of the officers using excessive force when
applying the zip-ties(plastic hand cuffs). I also suffered severe
headaches because of the constant blows to the head and I also
received a black eye from the brutality.

2. _____

3. _____

Signed this 17 day of December, 2006

Walter Norton
(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

December 17, 2006
(Date)

Walter Norton
(Signature of Plaintiff)